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MotionPoint Corporation

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - OAKLAND DIVISION

TRANSPERFECT GLOBAL, INC.,
TRANSPERFECT TRANSLATIONS
INTERNATIONAL, INC., AND
TRANSLATIONS.COM, INC.,

Plaintiffs/Counterclaim
Defendants,

v.

MOTIONPOINT CORPORATION,

Defendant/Counterclaim
Plaintiffs.

Case No. CV 10-02590 CW (JCS)

ELECTRONIC CASE FILING

**JOINT STIPULATION AND
[PROPOSED] ORDER MODIFYING
THE CASE SCHEDULE**

Judge: Hon. Claudia Wilken

Plaintiffs and Counterclaim Defendants TransPerfect Global, Inc., TransPerfect Translations International, Inc., and Translations.com, Inc. (collectively “TransPerfect”) and Defendant and Counterclaim Plaintiff MotionPoint Corporation (“MotionPoint”) hereby jointly move the Court to set certain dates in this case.

In light of extensive discovery to date, the parties have agreed to jointly request a modification of the schedule to allow the parties sufficient time to effectively schedule and complete depositions. This stipulation does not affect the current scheduled dates for submissions to the court and does not affect the current scheduled dates for dispositive motions, claim construction, or the trial date. By stipulation, the parties previously requested the Court modify the case schedule on October 7, 2011, which the Court granted on October 11, 2011. *See* Dkt. Nos. 94, 95. The parties have met and conferred and request that the Court enter the following schedule:

Event or Filing	Joint Proposed Dates
1) Fact Discovery Deadline ¹	May 25, 2012
2) Parties to Designate Experts	
Opening Expert Reports	June 11, 2012
Rebuttal Expert Reports (except for Rebuttal Damages Expert Reports)	July 2, 2012
1) Expert Discovery Deadline (except for Damages Experts)	July 13, 2012
2) Rebuttal Damages Expert Reports	
Damages Expert Discovery Deadline	July 19, 2012
Opening Briefs on dispositive motions for all claims and counterclaims and on claim construction due	July 26, 2012 (Unchanged)
Response Briefs due	August 9, 2012 (Unchanged)
Reply Briefs due	August 23, 2012 (Unchanged)

¹ The deadline for serving written discovery requests shall remain unchanged and is based on the currently effective fact discovery deadline of April 26, 2012.

1) All case-dispositive motions to be heard at 2:00 P.M.	September 6, 2012 (Unchanged)
2) Case Management Conference	
Final Pretrial Conference at 2:00 P.M.	November 21, 2012 (Unchanged)
10 day Jury Trial will begin at 8:30 A.M.	December 3, 2012 (Unchanged)

Dated: April 6, 2012

McDERMOTT WILL & EMERY LLP

/s/ Joel M. Freed

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Dated: April 6, 2012

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/s/ Joseph H. Lee

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TransPerfect Global, Inc.; TransPerfect Translations
International, Inc.; and Translations.com, Inc.*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Hon. Claudia Wilken

United States District Judge

1 I hereby attest pursuant to General Order 45.X.B. that concurrence in the electronic
2 filing of this document has been obtained from the other signatories.
3

4 Dated: April 6, 2012

/s/ Joseph H. Lee

JOSEPH H. LEE